

Remarks

The present response is to the Office Action mailed the above-referenced case on September 27, 2005, made final. Claims 1-3, 5-7 and 13-17 are presented for examination. Claims 1-3, 5-7 and 13-17 are rejected under 35 U.S.C. 112, second paragraph as being indefinite. Claims 1-3, 5-7 and 13-17 are rejected under 35 U.S.C. 103(a) as being unpatentable over Chiang et al. (U.S. Patent Application Publication No. 2004/0221292), hereinafter Chiang, in view of Britton, (U.S. Patent Application Publication No. 2002/0178170), hereinafter Britton and further in view of Fontana et al. (WO 9/15986) hereinafter Fontana.

Applicant has carefully studied the references provided by the Examiner, and the Examiner's rejections and statements of the instant Office Action. Responding to the Examiner's 112 rejection, applicant herein provides appropriate amendment to the claims to overcome the rejections. In response to the Examiner's merit rejections of applicant's claims, applicant herein provides a minor amendment to claim 1 to recite at least two legacy systems. Applicant further provides arguments to more particularly point out to the Examiner the subject matter of applicant's invention regarded as patentable and will clearly establishes that the claimed invention positively differentiates the invention of the present application over the inventions of the combined art.

Regarding claim 1 the Examiner has stated in his remarks that Chiang and Britton teach applicant's system architecture for adapting at least one legacy system for functional interface with at least one component system comprising all of applicant's claimed limitations, with the exception that both Chiang and Britton do not explicitly show the data reconciliation bus utilizes an in-memory entity relationship (ER) model. The Examiner provides the art of Fontana to teach said limitation, specifically relying on the 'abstract' of Fontana.

Applicant believes the Examiner does not understand the purpose and function of the ER models as taught in applicant's specification. Applicant argues that it is not obvious or inherent in the art of Fontana to teach said ER models when reading the

abstract of Fontana. The abstract of Fontana merely teaches that the output data from a developmental tool is transformed into a generic format data which is saved in a repository. The repository also contains all output data, application components, and information as to the relationship between the entities and objects stored in the repository. Each tool employed during the development process puts information into the repository and takes information out of the repository. In this way, the system integrates the tools used in different pails of the development process by passing necessary information from one tool to another. Applicant argues this teaching is insufficient to teach the specific ER models as claimed in applicant's invention.

Applicant's claim 1 specifically recites; "*and further characterized in that the data reconciliation bus utilizes an in-memory entity-relationship (ER) model of each legacy system of the architecture.*" Fontana teaches a system to improve the communication of the 'tools' used for legacy system integration with applications and components, for example, Rational Rose (which is a registered trademark of Rational), ER Win (which is a registered trademark of Logic Works, Inc.), and Designer/2000. Fontana uses one interface (subject of the invention) to integrate said tools (Figs. 4-9).

Applicant argues that clearly, when the uniform database of Fontana is accessed by separate tools there are no facilities taught necessitating ER models related to legacy systems as claimed. Fontana is not concerned with maintaining redundancy between legacy systems. Fontana teaches a system for communication sharing between tools. As seen in Fig. 6 of Fontana, the legacy components are chosen to be transformed into the domain model. There is absolutely no teaching of providing in-memory entity-relationship (ER) model of each legacy system of the architecture. Fontana provides a limited teaching of transforming all found legacy components into the domain model. There is no teaching of mapping between legacy systems via in-memory entity-relationship models of each legacy system as claimed (Fig. 6, lines 4-14).

Applicant urges that the key differentiator in applicant's connectivity bus is the utilization of 'n x m' connectivity which uses entity relationship (ER) models to represent unified normalized application models.

For the reasons outlined above by applicant, and the amendments to the independent claims, applicant believes that independent claims 1 and 13 now clearly and unarguably differentiate over the prior art references presented by the Examiner either singly or in combination. Depending claims 2-7 and 14-17 are then patentable on their own merits, or at least as depended from a patentable claim.

As all of the claims standing for examination have been shown to be patentable as amended and argued over the art of record, applicant respectfully requests reconsideration, that the prior art references be withdrawn, and that the present case be passed quickly to issue. If there are any time extensions needed beyond any extension specifically requested with this response, such extension of time is hereby requested. If there are any fees due beyond any fees paid with this amendment, authorization is given to deduct such fees from deposit account 50-0534.

Respectfully Submitted,
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